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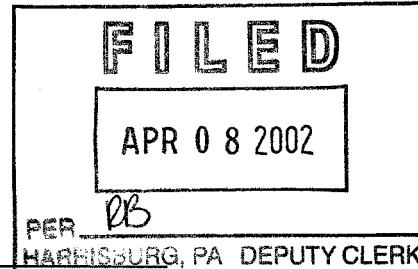
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The Law Offices of SPERO T. LAPPAS
205 State Street
Post Office Box 808
Harrisburg, Pennsylvania 17108-0808
(717) 238-4286

By: SPERO T. LAPPAS, Esquire
Pa. Supreme Court identification no. 25745

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CINDY L. RIGG, : CIVIL ACTION NO. 4:CV-01-0967
Plaintiff :
v. : JURY TRIAL DEMANDED
: :
COUNTY OF DAUPHIN, :
DAUPHIN COUNTY SHERIFF'S :
DEPARTMENT, :
RALPH McALLISTER, :
Defendants : (JUDGE RAMBO)✓



MOTION FOR ENLARGEMENT OF TIME

1. On March 6, 2002, Defendants, County of Dauphin and Dauphin County Sheriff's Department filed a motion to dismiss Plaintiff's amended complaint.

2. Due to the nature of the subject matter, Plaintiff requests an extension of time until April 12, 2002, to file the

brief in opposition to Defendants' motion to dismiss.

3. The requested extension of time is brief in duration, it will not unduly delay the adjudication of this matter on the merit, and it will not prejudice any party's substantive rights.

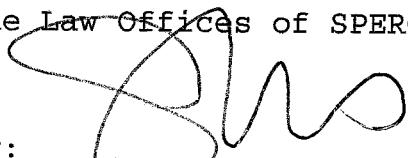
4. James D. Young, Esquire, counsel for Defendants, County of Dauphin and Dauphin County Sheriff's Department, concurs in this request for enlargement of time.

WHEREFORE, Plaintiff respectfully requests this Honorable Court grant this motion for enlargement of time to file a brief in opposition to Defendant's motion to dismiss until April 12, 2002.

RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

By:


SPERO T. LAPPAS, Esquire
Pa. Supreme Ct. ID no. 25745
205 State Street
P.O. Box 808
Harrisburg, PA 17108-0808
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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

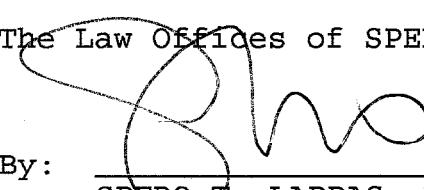
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|--------------------------|---|-------------------------------|
| CINDY L. RIGG, | : | |
| Plaintiff | : | CIVIL ACTION NO. 4:CV-01-0967 |
| v. | : | JURY TRIAL DEMANDED |
| | : | |
| COUNTY OF DAUPHIN, | : | |
| DAUPHIN COUNTY SHERIFF'S | : | |
| DEPARTMENT, | : | |
| RALPH McALLISTER, | : | |
| Defendants | : | (JUDGE RAMBO) |

CERTIFICATE OF CONCURRENCE

I, Spero T. Lappas, Esquire, do hereby certify that I have obtained the concurrence of James D. Young, Esquire, counsel for Defendants, County of Dauphin and Dauphin County Sheriff's Department in the attached motion for enlargement of time.

RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

By: 

SPERO T. LAPPAS, Esquire
Pa. Supreme Ct. ID no. 25745
205 State Street
P.O. Box 808
Harrisburg, PA 17108-0808
(717) 238-4286
Attorney for Plaintiff

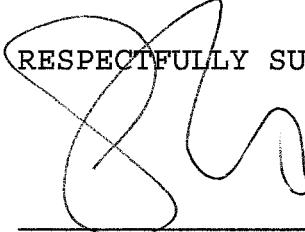
CERTIFICATE OF SERVICE

I hereby certify that on this date I served a true copy of the attached document upon the person(s) named below by:

James D. Young, Esquire
Lavery, Faherty, Young &
Patterson, P.C.
225 Market Street, Suite 304
P. O. Box 1245
Harrisburg, PA 17108-1245

E. Ralph Godfrey, Esquire
Metzger, Wickersham, Knauss & Erb, P.C.
3211 North Front Street
P. O. Box 5300
Harrisburg, PA 17110-0300

RESPECTFULLY SUBMITTED,



SPERO T. LAPPAS, ESQUIRE
205 STATE STREET
HARRISBURG, PA. 17108-0808

DATE: 4/8/02